

Paul Hejmanowski, Esq. (SBN #94)  
Charles H. McCrea, Esq. (SBN #104)  
PRHLAW LLC  
520 South Fourth Street, Suite 360  
Las Vegas, NV 89101  
T 702.834.6166  
paul@prhlawllc.com  
charles@prhlawllc.com

*Attorneys for DWIGHT MANLEY*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

DWIGHT MANLEY,

Plaintiff,

v.

MGM RESORTS INTERNATIONAL; MGM  
GRAND HOTEL, LLC,

Defendants,

AND ALL RELATED ACTIONS.

EJY  
Case No. 2:22-cv-01906-MMD-~~DJA~~

**STIPULATION AND ~~(PROPOSED)~~**  
**ORDER TO EXTEND CASE**  
**MANAGEMENT DEADLINES**  
**(Eighth Request)**

Pursuant to Fed. R. Civ. P. 26 and 30 and Local Rule 26-3, Plaintiff and Defendants submit this Stipulation and (Proposed) Order to extend the dispositive motion deadline and joint pre-trial memo deadline set forth in this Court's Order dated January 31, 2025 (ECF No. 155). The parties submit the following stipulation and order for the Court's consideration to allow the parties to continue working toward the proper preparation of this case prior to a trial.

The purpose of this stipulation is simply to allow Plaintiff to complete the FRCP 30(b)(6) deposition of Defendants, which commenced on March 5, 2025, and proceeded for several hours and was suspended by agreement to be continued at a later date prior to May 14, 2025. This request is brought out of necessity and in good faith, all toward the goal of further allowing the parties to complete necessary discovery to prepare the case for trial.

A requested brief extension will provide the parties with adequate time to accomplish the foregoing discovery. Accordingly, good cause exists for the requested extension.

The parties propose the schedule as follows:

	<u>Current</u>	<u>Proposed</u>
Deadline to File Dispositive Motions:	April 14, 2025	May 14, 2025
Joint Pretrial Memo:	April 26, 2025	June 14, 2025

### CONCLUSION

The parties respectfully request that the Court grant this stipulation and approve the proposed schedule as set forth above as the new deadlines in this matter.

Dated: April 10, 2025.

Dated: April 10, 2025.

SEMENZA RICKARD LAW

PRHLAW LLC

By: /s/Katie L. Cannata  
 Lawrence J. Semenza, III, Bar #7174  
 Katie L. Cannata, Bar #14848  
 10161 Park Run Dr. #150  
 Las Vegas, Nevada 89145

By: /s/Charles H. McCrea  
 Paul Hejmanowski, Bar #94  
 Charles H. McCrea, Bar #104  
 520 S. 4<sup>th</sup> St. #360  
 Las Vegas, Nevada 89101

Attorneys for Defendants

Attorneys for Plaintiff

**IT IS SO ORDERED this 10th day of April, 2025.**

  
 United States Magistrate Judge